

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

SHAUNA HURLES, <i>et al.</i> ,	)	CASE NO.: 3:23-cv-01986
	)	
Plaintiffs,	)	JUDGE: JACK ZOUHARY
vs.	)	
	)	
TIFFIN UNIVERSITY,	)	
	)	
Defendant.	)	

---

**JOINT STATUS REPORT**

---

Pursuant to the Court’s order dated March 20, 2024 (the “Order”), Plaintiffs Shauna Hurles (“Hurles”) and Alex Tozzie (“Tozzie”) (collectively, “Plaintiffs”) and Defendant Tiffin University (“Defendant”; together with Plaintiffs, the “Parties”) submit the following Joint Status Report:

1. In the Order, the Court directed the Parties to submit a status report “indicating discovery completed, discovery yet to be completed, and any discovery disputes” that the Court needs to address.
2. The Court, in its Initial Telephone Conference on November 20, 2023, temporarily stayed all legal filings to “allow counsel to begin and complete Rule 26(a) disclosures and “immerse” themselves in settlement discussions”.
3. On December 13, 2023 Plaintiff sent informal discovery requests to Defendants requesting documents crucial to analyzing the plaintiffs’ claims.
4. On January 3, 2024 Defendants’ provided their Initial Disclosures which contained 123 pages of documents that did not fully address Plaintiff’s informal discovery request from December 13, 2023.

5. The Court held a Status Conference on January 30, 2024 and ordered counsel to “engage in robust Rule 26(a) disclosures.”

6. On March 13, 2024 Plaintiffs’ narrowed their document requests to exclude Football, Women’s Outdoor Track, Women’s Indoor Track, Men’s Outdoor Track and Men’s Indoor Track.

7. On March 28, 2024 Defendants provided a partial response to Plaintiffs’ December 13, 2023 informal discovery request.

8. On April 1, 2024, Defendant issued its First Set of Interrogatories and Requests for the Production of Documents to Plaintiffs pursuant to FED. R. CIV. P. 33 and 34 (“Defendant’s Discovery Requests”).

9. On May 3, 2024, and May 7, 2024, Defendant contacted Plaintiffs regarding Defendant’s Discovery Requests, because Plaintiffs had not yet provided responses.

10. On May 7, 2024, Defendant provided Plaintiffs an extension of time, until June 6, 2024, for Plaintiffs to Defendant’s Discovery Requests.

11. On May 29, 2024, Defendant provided Plaintiffs another extension of time, until July 5, 2024, for Plaintiffs to respond to Defendant’s Discovery Requests.

12. Plaintiffs have not issued discovery requests to Defendant pursuant to FED. R. CIV. P. 33, 34, or 36.

13. On June 11, 2024, Defendant produced to Plaintiffs documents labeled TIFFIN\_000129-000243 (the “Production”), without awaiting formal document requests pursuant to FED. R. CIV. P. 34. The Production contains contracts for other coaches in response to Plaintiffs’ informal requests for salary information relating to Plaintiffs’ alleged comparators as relevant to Counts II and III of Plaintiffs’ First Amended Complaint.

14. On June 13, 2024 Plaintiff has requested dates for Defendants' Civ.R. 30(B) deposition due to the lack of full and complete responses to secure the records originally requested in the initial informal discovery requests, to include Fed.R. Civ. P. 34 requests.

15. Plaintiffs' responses to Defendant's Discovery Requests are due by July 5, 2024. After Defendant receives Plaintiffs' responses, Defendant intends to conduct necessary third-party discovery. Defendant also intends to depose Plaintiffs once Plaintiffs produce the documents responsive to Defendant's Discovery Requests.

16. Because Defendant has not yet received Plaintiffs' responses to Defendant's Discovery Requests, Defendant cannot evaluate whether there are discovery disputes that might require the Court's assistance.

17. After Plaintiffs receive deposition testimony and response to records requests Plaintiffs intend to take depositions of the relevant individuals related to the claim. The names and number of depositions is presently unknown until record discovery is complete. Plaintiffs believe there may be discovery disputes related to document disclosure but that matter is premature pending formal discovery.

Jointly submitted,

/s/ Joseph F. Albrechta

Joseph F. Albrechta (0008478)  
Christopher E. Liebold (100602)  
ALBRECHTA & COBLE, LTD.  
2228 Hayes Avenue, Suite A  
Fremont, Ohio 43420  
(419) 332-9999 – Telephone  
(419) 333-8147 – Facsimile  
jalbrechta@lawyer-ac.com  
cliebold@lawyer-ac.com  
kwitte@lawyer-ac.com

David T. Albrechta (48431)  
Eleni K. Albrechta (48429)  
Albrechta & Albrechta, LLC  
530 Main Avenue, Suite D3  
Durango, CO 81301  
(970) 422-3288 – Telephone/Fax  
David@AlbrechtaLaw.com  
Eleni@AlbrechtaLaw.com

Tod J. Thompson (0076446)  
810 Sycamore Street, Floor Three  
Cincinnati, Ohio 45202  
(513) 322-4348 – Telephone  
(513) 263-9001 – Facsimile  
tod@tthompsonlaw.com

*Attorneys for Plaintiffs Shauna Hurles  
and Alex Tozzie*

/s/ Rachel L. Hazelet

Steven E. Seasly (0070536)  
sseasly@hahnlaw.com  
Rachel L. Hazelet (0097855)  
rhazelet@hahnlaw.com  
**HAHN LOESER & PARKS LLP**  
200 Public Square, Suite 2800  
Cleveland, Ohio 44114  
Phone: (216) 621-0150  
Fax: (216) 241-2824

*Attorneys for Defendant Tiffin  
University*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2024, a true and accurate copy of the foregoing was filed electronically, which will send notice to all counsel of record.

/s/ Rachel L. Hazelet

*One of the Attorneys for Defendant  
Tiffin University*